Hearing Date: April 20, 2022 at 10:00 am
Objection Date: March 15, 2022
Reply Date: March 31, 2022

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re: Fairfield Sentry Limited, et al., Debtors in Foreign Proceedings.	Ch. 15 Case Case No. 10-13164 (CGM) Jointly Administered

Fairfield Sentry Limited, et al. (In Liquidation), acting by and through the Foreign Representatives thereof,
 	
      Plaintiffs,
 	
   – against –
 	
Theodoor GGC Amsterdam et al.,
 	
      Defendants.
	Adv. Pro. No. 10-03496 (CGM)
	
	Administratively Consolidated
	
	ORAL ARGUMENT
	REQUESTED

FAIRFIELD SENTRY LIMITED (IN LIQUIDATION), et al.,
 	
      Plaintiffs,
 	
   -against-
 	
ABN AMRO SCHWEIZ AG, et al.,
 	
      Defendants.
	Adv. Pro. No. 10-03635 (CGM)

NOTICE OF MOTION TO DISMISS

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Defendant Lloyds Bank plc's Motion to Dismiss the Plaintiffs' Fifth Amended Complaint dated August 11, 2021, in the above-captioned action, set forth as Exhibit A hereto, and all prior pleadings and proceedings herein, Defendant Lloyds Bank plc ("Lloyds" or "Defendant") (formerly Lloyds TSB Bank Geneva) will move this Court for an order dismissing with prejudice

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the complaint filed by the Liquidators of Fairfield Sentry Limited and Fairfield Sigma Limited, pursuant to Rule 12(b)(2) of the Federal Rules of Civil Procedure, made applicable here by Rule 7012 of the Federal Rules of Bankruptcy Procedure.

PLEASE TAKE FURTHER NOTICE that, pursuant to Rule 7012(b) of the Federal Rules of Bankruptcy Procedure, Defendant does not consent to the entry of final orders or judgment by this Court.

Dated: October 29, 2021
   New York, New York

       Respectfully Submitted,

       KATTEN MUCHIN ROSENMAN LLP

       By: */s/ Anthony L. Paccione*

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TO: All Counsel of Record

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